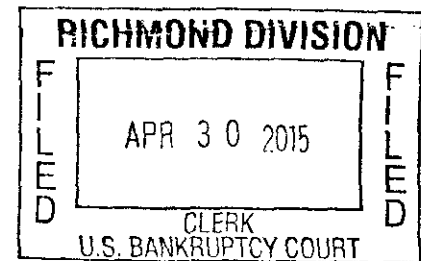


April 28, 2015

William C. Redden  
Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219



RE: Richmond Christian Center - Case 15-03304-KLP

Mr. Redden,

In response to the Summons and Notice in an Adversary Proceeding, the following answer pertains to Answers by Commercial Mortgage City Corporation and Jeffrey Lustbader.


1. Dr. Steve Parson contacted Commercial Mortgage City Corporation (CMC) to assist with the refinancing of Church owned real estate. Dr. Parson found CMC through an internet search.
2. CMC, over the last 12 years, has never asked for or up front money for its mortgage services.
3. CMC was asked to assist with the refinancing of RCC Church owned real estate with current debt held by an adversarial lender.
4. The Richmond Christian Center (RCC) engaged other funding sources to refinance the Church property. CMC was not exclusive.
5. CMC worked with Dr. Parson and communicated with other members of RCC to assemble a financing package for potential lenders.
6. CMC contacted several financial institutions to fund the Church property.
7. CMC introduced Dr. Parson to Ken Stevenson of KSUS.
8. CMC has no relationship to KSUS nor did CMC ever do business with KSUS.
9. KSUS requested a good faith deposit in the amount of one half of one percent (\$10,755) of the requested loan amount (\$2,155,000). (See Exhibit D of the Complaint)
10. RCC provided documents to KSUS for underwriting and was offered terms to refinance the RCC property.
11. KSUS made a written offer to RCC (Exhibit D).

*JE*

12. KSUS requested additional explanations and proof of financial representations from Dr. Parson and RCC. RCC was unable to provide substantive documentation to support its financial representations. Once such request was for verification of Cash and or Escrow funds on the RCC financial statement. RCC was unable to provide such verification.
13. CMC entered this assignment in good faith, performed diligently, and provided a fundig source ready and willing to refinance the RCC property.
14. The Summons referred to herein is the only notice received from the Court or any other agency pertaining to this case.

In view of the above, Commercial Mortgage City Corporation and or Jeffrey Lustbader respectfully request our removal from being named as Defendant in this case.


Respectfully,



Jeffrey Lustbader

President

*Also as Individual*



Jeffrey Lustbader